

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

ROSE L. EPPERSON,
Individually
and as class representative for all similarly
situated persons,

Plaintiff,

v.

INTERNATIONAL PAPER COMPANY,
KERR-MCGEE
CHEMICAL CORPORATION,
KERR-MCGEE OPERATING
CORPORATION, and BNSF
RAILWAY COMPANY,

Defendants.

Civil Action No. 2:20-CV-00053-JDC-CBW

Judge James D. Cain, Jr.

[PROPOSED] ORDER

THIS MATTER having been brought before the Court on the motion of plaintiff Rose L. Epperson, pursuant to Fed. R. Civ. P. 37, for an order compelling the deposition of Emily W. Lee; and for costs;

On this ____ day of _____, 2025, the Court

GRANTS plaintiff's Motion to Compel Deposition and for costs and attorneys' fees;
and;

FURTHER ORDERS that the deposition of Emily W. Lee shall take place before
November 3, 2025, and;

FURTHER ORDERS that plaintiff shall file with the Court a sheet of costs and fees to
be considered by this Court within two (2) weeks of this Order.

Judge Carol B. Whitehurst